

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

DOCKET
OFFICE
Docket No. R97-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE OFFICE OF THE CONSUMER ADVOCATE WITNESS COLLINS
(USPS/OCA-T-700-1-3)

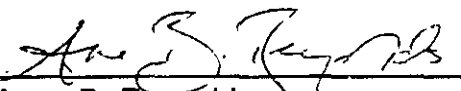
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Office of the Consumer Advocate witness Collins: USPS/OCA-T-700-1-3.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anne B. Reynolds

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January 9, 1998

USPS/OCA-T700-1. At page 14, line 8 of your testimony, you indicate that the rates you propose will provide revenues of "approximately \$9 million less" than the Postal Service's proposed rates. Please indicate where in your exhibits you derive the \$9 million revenue differential. If not shown in your exhibits, please show the calculation of this figure.

USPS/OCA-T700-2. Your testimony proposes a rate of \$1.13 for the first pound of Library Rate Mail.

- a. Why did you select this rate?
- b. Did you consider others?
- c. Please show all calculations used in reaching your decision to select this rate.

USPS/OCA-T700-3. Please confirm that, as mandated by law, the cost coverage relationship between Library Rate and Standard B Special Rate is different than that between Classroom and Nonprofit Rates. If you do not confirm, please explain fully.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Anne B. Reynolds

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